CLARK HILL PLC 500 Woodward Avenue, Suite 3500 Detroit, Michigan 48226-3435 Robert D. Gordon (Mich. Bar. No. P48627) admitted *pro hac vice* rgordon@clarkhill.com (313) 965-8572

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:	)	Chapter 11
DELPHI CORPORATION, et al.,	)	Case No. 05-44481 (RDD) (Jointly Administered)
Debtors.	)	

## AMENDED NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS ON BEHALF OF ATS AUTOMATION TOOLING SYSTEMS INC.

PLEASE TAKE NOTICE that, pursuant to Rule 9010(b) of the Federal Rules of Bankruptcy Procedure, the undersigned hereby enters his appearance in this case as counsel for ATS Automation Tooling Systems Inc. ("ATS").

FURTHER, PLEASE TAKE NOTICE that, pursuant to Rules 2002(i) and 9007 of the Federal Rules of Bankruptcy Procedure, the undersigned hereby requests that all notices and all other papers required to be served in this case be served upon the following persons and that the following persons be added to the mailing matrix in this case:

Robert D. Gordon Clark Hill PLC 500 Woodward Avenue, Suite 3500 Detroit, Michigan 48226-3435 (313) 965-8572 (313) 965-8252 (facsimile) rgordon@clarkhill.com ATS Automation Tooling Systems Inc. Attention: Carl Galloway 250 Royal Oak Road Cambridge, Ontario N3H 4R6 Canada (519) 653-4483 (519) 650-6520 (facsimile) cgalloway@atsautomation.com 05-44481-rdd Doc 1498 Filed 12/13/05 Entered 12/13/05 16:34:15 Main Document Pg 2 of 2

FURTHER, PLEASE TAKE NOTICE that, without limiting the foregoing request for

service of all notices and other papers, the undersigned specifically requests, pursuant to Rule

3017(a) of the Federal Rules of Bankruptcy Procedure, to be served with all proposed plans of

reorganization and disclosure statements and objections relating thereto, as well as all other

pleadings, memoranda, and briefs in support of any of the foregoing.

Neither this Notice of Appearance, nor any subsequent appearance, pleading, claim or suit,

is intended to waive: (a) ATS's rights to have final orders in non-core matters entered only after

de novo review by a federal district court judge; (b) ATS's rights to trial by jury in any proceeding

so triable herein or in any case, controversy or proceeding related hereto; (c) ATS's rights to have

the reference withdrawn by the federal district court in any matter subject to mandatory or

discretionary withdrawal; or (d) any other rights, claims, actions, defenses, setoffs, or

recoupments to which ATS is or may be entitled in law or in equity, all of which rights, claims,

actions, defenses, setoffs, and recoupments ATS expressly reserves.

CLARK HILL PLC

By: /s/ Robert D. Gordon

Robert D. Gordon (Mich. Bar No. P48627)

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Attorneys for ATS Automation Tooling Systems Inc.

Dated: December 13, 2005